

REMARKS

Claims 1-14, 17, 20-50, and 62-67 are pending and stand rejected. Claims 1, 36, and 63 are amended herein. Claims 1-14, 17, 20-50, and 62-67 remain pending upon entry of this amendment.

35 U.S.C. § 102 Rejection

Claims 1-9, 35-41, 49-50, 63-65, and 67 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Saga Software, Inc., (WO 00/29924). Applicants respectfully traverse this rejection as applied to the amended claims.

Amended claim 1 recites a method of creating an application for executing on at least one machine having a memory. The method comprises creating a definition of a node and a specification, both of which are held in at least one machine readable data file. The amended claim recites that the specification is arranged to be processed by a run time environment and defines:

- i: how the at least one node interacts with other nodes during the processing of the specification;
- ii: resources useable by the at least one node during the processing of the specification;
- iii: at least one set of predetermined rules used by the at least one node during the processing of the specification; and
- iv: a set of messages which are arranged to be passed between nodes during the processing of the specification;

In addition, the amended claim recites “causing the run time environment to process the specification” such that the defined node is “implemented within the memory of the machine” as a memory resident node. Processing the specification in the run time environment interconnects the memory resident node such that data input to the application created by processing of the specification is processed by the node, and links between nodes are dynamically configured responsive to amendments to the specification during processing.

Saga does not disclose a specification having the characteristics recited by the amended claim. Saga describes an extensible distributed enterprise application integration system. However, Saga does not disclose a specification that defines how a node interacts with other nodes, resources usable by the node, rules used by the node, and a set of messages that are arranged to be passed between nodes. To the extent that Saga discloses these aspects at all, they are merely separate elements of Saga's system and not defined by a single specification as claimed.

The lack of the claimed specification in Saga is demonstrated by the rejection of the "specification" element in the previous version of the claim. The Examiner cites to many portions of Saga to support the rejection, including FIG. 5(a), element 518; page 23, lines 32-34; page 28, lines 28-30; FIG. 2, element 300; page 21, lines 7-71; page 5, lines 8-9; page 9, lines 16-25; page 18, lines 6-8; page 18, lines 14-15; page 20, lines 29-33; and page 20, lines 17-24. Page 23 of Saga describes message hubs that are used to receive and deliver system messages to and from target integration objects but these hubs are not defined by a specification. Page 21, lines 7-15 mention the phrase "application resources" but does not disclose that these resources are defined by a specification. Saga discusses rules engines at page 5 and page 9, but again does not disclose that rules for the engines are defined by a specification. Finally, Saga mentions messages at pages 17, 18, and 20, but does not disclose that the messages are defined in the same specification that defines node interactions, resources, and rules.

Additionally, Saga does not disclose that the system includes "links between nodes [that] are dynamically configured responsive to amendments to the specification during processing thereof by the run time environment" as recited by claim 1. The Examiner asserts that this element is shown by Saga at a variety of places, including page 20, lines 17-19 and 25-26; page

3, lines 28-31; page 17, lines 31-33; and page 12, lines 27-29. Lines 17-19 of page 20 describe how an integration server “executes static and dynamic context sensitive rules that evaluate, modify, and route event data.” Lines 25-26 of the same page describe a node services component that manages “dynamic configuration” of the system. Neither these portions nor the other portions of Saga cited by the Examiner disclose that links between nodes are “dynamically configured” in response to amendments to the specification during processing by a run time environment. Rather, Saga merely describes execution of context sensitive rules and states that its system can be dynamically configured. There is no teaching that the dynamic configuration occurs in response to amendments to the specification as claimed.

Applicants respectfully submit that claim 1 is not anticipated by Saga. Claims 36 and 63 each recite one or more of the features described above and are also not anticipated for at least the same reasons. The dependent claims incorporate the limitations of their respective base claims and are also not anticipated for at least the same reasons. Accordingly, Applicants request that the Examiner withdraw the § 102 rejections.

35 U.S.C. § 103 Rejections

Claims 20-26, 28-34, 42-48, 62, and 66 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Saga in view of Thilmany et al. (Biztalk®: Implement Design Patterns for Business Rules with Orchestration Designer). Claims 10-12 and 14 stand rejected under § 103(a) as being unpatentable over Saga in view of Moore et al. (Pub. No. US 2004/0034848). Claim 13 stands rejected under § 103(a) as being unpatentable over Saga in view of Moore and further in view of Lee et al. (The Extensible Rule Markup Language). Claims 17-27 stand rejected under § 103(a) as being unpatentable over Saga in view of Bowman-Amuah) (Pat No.

US 6,601,234). Applicants respectfully traverse these rejections as applied to the amended claims because Thilmany, Moore, and Lee do not remedy the deficiencies of Saga described above. Therefore, a person of ordinary skill in the art at the time the invention was made would not find the claimed invention obvious in view of any combination of Saga, Thilmany, Moore, and Lee and Applicants request that the Examiner withdraw the rejections.

CONCLUSION

Applicants respectfully submit that the pending claims are patentable over the cited art and request that the Examiner withdraw the rejections and allow the claims. The Examiner is invited to contact the undersigned to advance the prosecution of this case.

Respectfully submitted,
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